

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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DE LAGE LANDEN FINANCIAL  
SERVICES, INC.

Case No. 2:20-cv-01908-CMR

**Plaintiff**

v.

SANJAY SINGH  
ROYAL BENGAL LOGISTICS, INC

**REPLY & COUNTER CLAIM  
JURY TRIAL REQUESTED  
MOTION TO DISMISS  
MOTION TO STRIKE EXHIBIT A**

**Defendant**

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Defendants, ROYAL BENGAL LOGISTICS, INC ("RBL"), SANJAY SINGH ("SINGH") (collectively the "Defendants"), by PRO-SE, hereby submit this REPLY with COUNTER CLAIM to the complaint (the "Complaint") of De Lage Landen Financial Services, Inc. ("DLL") as follows:

**Introduction**

PLAINTIFF; Referred as "DLL" is a Michigan corporation, Defendants Referred as "SINGH" is a resident of Florida and "RBL" is a Florida corporation. DLL is an Equipment finance company.

**I. COUNT I-BREACH OF CONTRACT-LOANS 100-10192585 & 100-10202717 & 100-10203155**

Defendant's "SINGH" and "RBL" denies allegation of default on the contract due to Unconscionable Contract. Defendant denies all default allegations as alleged. Defendants Alleges damages of more than and seek counter claim of \$50000.00 on each contract as alleged in the complaint

**II. Count II**

**COUNT II-BREACH OF PERSONAL GUARANTY**  
**DE LAGE LANDEN V. SINGH/RBL**

Defendants Denies all allegation as alleged due to unconscionable contract.

**III. Count III.**

**COUNT III-UNJUST ENRICHMENT**

Defendants denies all allegation, as alleged in the complaint.

Defendants specifically raise all affirmative defenses contained in Pa.R.C.P. No. 1030, and reserves its rights to raise any other affirmative defenses that may be revealed in discovery proceeding

**Counter Claim**

- a) Defendants Claims that "DLL" and attorney for DLL arc engaged in Fraud in attempt to expeditious recovery of financed money if any financed by the Plaintiff to the defendants.

- b) Defendants also claim damages for business Interference, Intimidation, Extortion and defamation in excess of 1000,000.00 not including any punitive damages.
- c) Defendants alleges that Plaintiff is in violation of Truth in Lending Act (TILA) as claimed under the Plaintiffs complaint of allegation in Count II.

**Jury Trial requested**

1. Defendants Request Jury Trial in the interest of Justice

**Defendants Motion to dismiss**

**Defendants files the Motion to dismiss on the following facts:**

1. The Court lacks Jurisdiction; as per the complaint filed by the plaintiff, the plaintiff did not properly disclose to the court the relationship geographical and contractual relationship Between "DLL" & "RBL" and "SINGH" and is not appropriate.
2. The Court lacks Jurisdiction Due Federal Question arising from this matter, THEREFORE court lacks Subject Matter Jurisdiction.
3. Defendant moves to dismiss the plaintiffs claim due to "The Plaintiff fails to state a claim where relief can be granted".


**Motion to Strike**

Defendants files this Motion to Strike Exhibit A from Plaintiffs complaint, alleging that Exhibit A is so **unintelligible** and illegible exhibits that defendants deeming the allegations of fact in a pleading to be so insufficiently claimed that adequate answer to the Complaint is impossible.

Respectfully submitted,

MAY 6TH, 2020

In Pro-se;

  
SANJAY SINGH,

Royal Bengal Logistics, INC

3700 NW 109<sup>th</sup> Ave, Coral Springs, FL-33065  
PH: (510) 342-6770  
Email: Admin@rbltransports.com


### Certificate of Service

I hereby certify that on MAY 6TH, 2020, I filed the foregoing REPLY & COUNTER CLAIM, JURY TRIAL REQUESTED; MOTION TO DISMISS, MOTION TO STRIKE EXHIBIT-A to the Clerk of the Court. I also certify that the foregoing document is being served this day on all counsel of record. Service List in the manner specified, either via transmission of email as mutually agreed.

### **SERVICE LIST**

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